

# EXHIBIT F

1 A. No. He was doing different things just  
2 like driving a truck around, picking up  
3 computers, picking up books, doing this --

4 Warren Davis was working with the  
5 science kits. The principal of -- what's  
6 that? Loveless? Houston Hill? After they  
7 moved him -- removed him from the  
8 principal's job, he came out to Logistics  
9 to work with the science kits.

10 Q. If you'll look at paragraph 16 of your  
11 complaint.

12 A. 16?

13 Q. Yes. Does that say that Ronnie Causey had  
14 been hired to work with science kits?

15 A. That say he was assigned to pick up science  
16 kits. He wasn't hired to work with science  
17 kits. Didn't hire him to work with science  
18 kits.

19 Q. It says: On or about August 5th, 2003,  
20 Ronnie Causey, white male, and Plaintiff  
21 were assigned to pick up science kits. And  
22 in parentheses, Causey is a white employee  
23 who had been hired to work at Logistics as

1 a Laborer 2 with the science kits.

2 Is that a correct statement or an  
3 incorrect statement?

4 A. This is incorrect right here, to work with  
5 the science kits. You have to be a Laborer  
6 3 to work with the science kits.

7 Q. Okay.

8 A. He might have been picking up some science  
9 kits. But work with the science kits, you  
10 have to be a Laborer 3.

11 Q. And before this, when y'all had that thing  
12 out on the dock, were y'all going to pick  
13 up some science kits?

14 A. Yes.

15 Q. Did he do that often?

16 A. No, because those science kits don't -- I  
17 think they stay out maybe a month or so,  
18 and then we'll go out -- everybody will  
19 pick them up. Everybody deliver them. I  
20 mean, there's so many. You know, imagine  
21 60 schools. Everybody that can drive goes  
22 out and picks up science kits and delivers.

23 Q. Do you know whether Betty Smith ranked you

1 Q. Anything else? Any other racial statements  
2 or racist statements Mike Strength made?

3 A. That's the only ...

4 Q. In Exhibit 10, did you tell Mr. Barker  
5 about those statements other than just  
6 saying he had made some racial statements?

7 A. No, I didn't pinpoint it like that.

8 Q. You say that Mike Strength assigned  
9 demoralizing tasks to blacks; is that  
10 right?

11 A. Yeah.

12 Q. And what did you consider a demoralizing  
13 task?

14 A. I was asked on several occasions to go out  
15 and -- like you'll see on there, the  
16 supervisor thing, to wash his car and wash  
17 the director car, so I did that.

18 Next, he would send you out there like  
19 at 12 o'clock in the day. I never seen a  
20 white person out there cutting grass. And  
21 you had to cut this whole big field out  
22 there with a push mower. We had to do  
23 that.

1           And one of the -- what's his name had  
2           to go over to Daisy Lawrence -- that's  
3           where -- In the basement, we carried the  
4           computers and things down there, and that's  
5           where they used -- was using the storage  
6           area for, the computers and things. And  
7           all the sewage pipe had busted and drained  
8           down in there.

9           He sent Jerome Williams, myself, and  
10          Johnny Mitchell over there I guess for a  
11          week or two. One of the guys got sick from  
12          it, and they -- Jerome Williams, I think.  
13          I don't know if he quit or -- because he  
14          didn't show up for two or three days. I  
15          don't know if they fired him or he just  
16          quit.

17          And it wasn't nothing but blacks over  
18          there.

19        Q.     So in that Exhibit 10, you told Mr. Barker  
20           the example about Mike Strength saying get  
21           out there and wash my car and wash Jacky  
22           Todd's car, too. You told him about that  
23           one? Yes or no.